

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-against-

RESTRAINING ORDER

Case No: 19-1014M

AARON WEINREB

Defendant.
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Upon the application of the defendant AARON WEINREB and Brian Griffin and Scott Gross, counsel for defendant, and with the consent of RICHARD P. DONOGHUE, United States Attorney for the Eastern District of New York, by Assistant United States Attorney, Michael Bushwack,

It appearing to the satisfaction of the Court that defendant AARON WEINREB has been released upon a \$1.5 million bond and that it has been agreed that the bond will be secured by \$1.5 million in assets, and

It further appearing that defendant, AARON WEINREB is the sole owner of a Simplified Employee Pension account at Chase Bank, ending in the digits "6752" (the SEP Account), and an Individual Retirement Account at AXA Equitable ending in digits "3748" (the IRA Account)

It further appearing that a condominium unit (Condo unit) is owned by the defendant's wife, SARAH WEINREB, located at 5225 Collins Avenue, Apt. 817, Miami Beach, Florida 33140.

It further appearing to the satisfaction of the Court that reasonable cause has been shown for the entry of this Restraining Order, upon consent of the United States and defendant AARON WEINREB, and pursuant to 18U.S.C. §3141, ET SEQ.,

IT IS HEREBY ORDERED that:

Defendant AARON WEINREB and his wife SARAH WEINREB, as well as all attorneys, agents, employees, nominees, and anyone acting for or in concert with defendant

AARON WEINREB, having any interest or control over the assets currently held in the SEP & IRA accounts and the Condo unit, and having actual knowledge of this Order, shall fully comply with this Order and shall not take any action prohibited by this Order; and

IT FURTHER ORDERED AS FOLLOWS:

1. Defendant AARON WEINREB and his wife SARAH WEINREB, as well as his agents, nominees, servants, employees, attorneys, family members, and those persons with actual knowledge of this Order having any interest or control over the assets currently held in the SEP & IRA accounts and the condo unit, or being in active concert or participation with defendant Weinreb, shall not:
 - a) Direct or indirectly alienate, dissipate, transfer, sell, assign, lease, pledge, encumber, or dispose of any assets currently held in the SEP & IRA accounts and the condo unit, IN ANY MANNER;
 - b) CAUSE THE ASSETS CURRENTLY HELD IN THE SEP & IRA accounts and the Condo unit to be alienated, dissipated, transferred, sold, assigned, leased, pledged, encumbered, or disposed of in any manner; or
 - c) Take, or cause to be taken, any action which could have the effect of concealing or moving the assets in the SEP & IRA accounts and the Condo unit from the jurisdiction of this Court, or take or cause to be taken, any action that would have the effect of depreciating, damaging, or in any way diminishing the value of the assets currently held in the SEP & IRA accounts and the Condo unit.
2. If any of the assets held in the SEP & IRA accounts and the Condo unit as of October 30, 2019, have been or is transferred or disposed of prior to the signing of this Order, the transferors shall account in writing, within three (3) business days of the date of this Order, to the Court and counsel for the United States for the disposition and location of the property.
3. All financial institutions affected by this Order, including but not limited to Chase and AXA are directed to prevent and are otherwise enjoined from transferring, by wire or

otherwise, conveying or disposing of any of the assets held in the SEP & IRA accounts and the Condo unit as of the signing of the Order.

4. Chase and AXA are directed to notify the United States Attorney's Office for the Eastern District of New York if, at any time following the date of this Order, the assets in the SEP & IRA accounts and the condo unit are valued at less than \$1.5 million. Chase and AXA shall make this notification in writing within one (1) business day of any such valuation.
5. All financial institutions affected by the Order, including but not limited to Chase and AXA, shall take no offsets against the SEP & IRA accounts and the Condo unit. They shall continue to credit any deposits, interest, dividends, and other credit shall be subject to this Order.
6. This Order shall remain in effect until further Order of the Court or until the Court modifies the Order as appears necessary in the interests of Justice and consistent with the purposes of 18U.S.C. § 1341, et seq.
7. Any person or entity who violates or assists in any violation of this Order shall be subject to all appropriate penalties, including, but not limited to, contempt of Court.
8. The Defendant may serve defendant AARON WEINREB, SARAH WEINREB, Chase and AXA, and any financial institution with a copy of this Order by facsimile or email transmission, provided that a hard copy is thereafter served by regular mail, overnight mail or personal service.

Dated: Garden City, New York
November 19, 2019

SO ORDERED

S/Margo K. Brodie

THE HONORABLE
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK